

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	No. 20 CR 812
)	
MICHAEL McCLAIN, et al.)	Honorable Harry D. Leinenweber
)	

**DEFENDANT ANNE PRAMAGGIORE’S
MOTION FOR LEAVE TO FILE CONSOLIDATED MOTIONS *IN LIMINE*
IN EXCESS OF FIFTEEN PAGES**

Defendant Anne Pramaggiore (“Ms. Pramaggiore”), through her undersigned counsel, respectfully requests leave to file consolidated motions *in limine* in excess of the 15-page limit allowed by Local Rule 7.1. In support of this motion, Ms. Pramaggiore states as follows:

1. Pursuant to the Court’s December 1, 2022 Order, the parties’ motion *in limine* filings are due on February 6, 2023. (*See* Dkt. 108 at 1.)

2. Because Ms. Pramaggiore’s anticipated motions *in limine* will rely on similar background facts, Ms. Pramaggiore submits that it will be most efficient to file consolidated motions *in limine* rather than separate motions.

3. Despite Ms. Pramaggiore’s best efforts, in order to adequately explain the factual and legal theories supporting her motions *in limine*, her consolidated filing must exceed the page limitation imposed by Local Rule 7.1.

4. Accordingly, Ms. Pramaggiore respectfully requests leave to file consolidated motions *in limine* consisting of no more than 23 pages, excluding tables of contents and authorities.

WHEREFORE, Defendant Anne Pramaggiore respectfully requests that the Court enter an Order granting leave to file consolidated motions *in limine* consisting of no more than 23 pages, excluding tables of contents and authorities.

DATED: February 6, 2023

Respectfully submitted,

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